

# **EXHIBIT 1**

**DI 280**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER'S MONTHLY REPORT  
FOR THE PERIOD ENDING MAY 31, 2021**

Dated: June 9, 2021  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

June 9, 2021

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
Chief Judge  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended May 31, 2021 (this "**Report**")

Dear Chief Judge Stark:

By order dated April 13, 2021 (D.I. 258), Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* (D.I. 277, the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (each as defined in the May 27 Order), including my obligation to provide this Report to the Court, and thereafter on a monthly basis, reports concerning the progress of my efforts. I hereby write to provide this Report for the period since my appointment through May 31, 2021.

**Retention of Advisors**

Since April 13, 2021, I have retained Potter Anderson & Corroon LLP ("**Potter Anderson**"), as Delaware counsel, Jenner & Block LLP ("**Jenner & Block**"), as OFAC counsel, and Weil, Gotshal & Manges LLP ("**Weil**"), as transaction counsel. I have further notified the Parties and ConocoPhillips of my determination to retain Evercore, Inc. as my financial advisor. Following consultation with the Parties and ConocoPhillips, I intend to finalize Evercore's engagement this week.

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark  
June 9, 2021 PUBLIC VERSION - February 28, 2023  
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### **Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions in accordance with my duties and obligations set forth in the May 27 Order:

- Working with the Parties and ConocoPhillips to submit the proposed Order Regarding the Special Master to the Court, which was entered by the Court on May 27, 2021.
- Developing a Proposed Sale Procedures Order for submission to the Court by July 26, 2021.
- Commencing consultation with the Parties and ConocoPhillips. I intend to consult frequently with the relevant stakeholders and the Court in the performance of my duties and obligations.
  - My Counsel and I have held initial meetings with advisors to certain of the Parties and ConocoPhillips.
  - We have contacted the Parties and ConocoPhillips to schedule another consultation with respect to the terms of the Proposed Sale Procedures Order and I expect those meetings to take place shortly.
  - Through my counsel, Jenner & Block, I began communications with OFAC and expect to have an initial meeting with OFAC staff in the near future.
- Pursuant to my duty to “work to become knowledgeable about the business operations and assets of CITGO and PDVH” mandated by the May 27 Order, I began preparing, with my advisors, a preliminary diligence request list to provide to CITGO.
- I held meetings and consulted with my advisors regarding their ongoing diligence and communications with stakeholders and reviewed items to be addressed during this period and in the future.

### **Statement of Fees and Expenses**

Finally, the May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period April 13, 2021 through May 31, 2021, I have incurred an aggregate of \$287,032.98 of fees and expenses in connection with carrying out my duties as Special Master. The Itemized Statement, attached as Annex A hereto, contains a breakdown of such fees and expenses among myself and my Counsel.

The Honorable Leonard P. Stark  
June 9, 2021 PUBLIC VERSION February 28, 2023  
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I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court of Delaware

Enclosures

cc: Counsel of Record (by CM/ECF and E-Mail)

# **EXHIBIT 2**

**DI 292**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER’S MONTHLY REPORT  
FOR THE PERIOD ENDING JUNE 30, 2021**

Dated: July 9, 2021  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

July 9, 2021

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
Chief Judge  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended June 30, 2021  
(this "**Report**")

Dear Chief Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* (D.I. 277) (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (each as defined in the May 27 Order), including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended May 31, 2021 (D.I. 280) (the "**May Report**"). I hereby write to provide this Report for the period since the May Report through June 30, 2021.

**Retention of Advisors**

Since the filing of the May Report, I have entered into an engagement letter with Evercore, Inc. ("**Evercore**") for the limited purpose of getting to a Sale Procedures Order, following consultation with the Parties and ConocoPhillips (the "**Engagement Letter**"). As noted in the May Report, Evercore will serve as my financial advisor and will work alongside my other advisors (collectively, the "**Advisors**"). At this stage, the scope of the Engagement Letter is limited to

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order



The Honorable Leonard P. Stark  
July 9, 2021 Public Version - February 28, 2023  
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advising me in connection with my specific duties set forth in the May 27 Order as they pertain to designing and obtaining entry of the Proposed Sale Procedures Order.

### **Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions in accordance with my duties and obligations set forth in the May 27 Order:

- Maintained ongoing dialogue and consultation with the Parties and ConocoPhillips regarding the performance of my duties and obligations set forth in the May 27 Order.
  - My Advisors and I have held meetings with advisors to the Parties and ConocoPhillips to discuss the terms of the Proposed Sale Procedures Order.
  - By letter dated June 15, 2021, I requested that Crystallex and ConocoPhillips provide me with a statement of their outstanding judgments and to provide certain other information and documentation related to their judgments by June 25, 2021:
    - Counsel to ConocoPhillips provided a written response to the information request letter on June 25, 2021.
    - Counsel to Crystallex requested an extension of the time to respond to the information request letter, which extension was granted until three business days following entry of the Protective Order (as defined below).
  - By letter dated June 24, 2021, I have requested that each Party and ConocoPhillips provide me with a written summary and outline setting forth their position regarding the form of the Sale Procedures Order and any information that they believe I should consider in relation to development of the Proposed Sale Procedures Order.
- Initiated contact with the United States and requested an open dialogue as my Advisors and I develop the Proposed Sale Procedures Order.
  - On June 6, 2021, my Advisors and I met with representatives from the United States, including representatives from the Department of Justice, Department of State, Department of Treasury, and the Office of Foreign Asset Control.
  - I have requested two follow-up meetings, which are now scheduled during the week of July 12, 2021.

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- Drafted and filed a proposed protective order (D.I. 283-1) (the “***Protective Order***”), as contemplated in the May 27 Order and revised the Protective Order consistent with the Court’s Memorandum Order dated July 6, 2021.
- Drafted and delivered a diligence request list to counsel to PDVH and CITGO on June 8, 2021. PDVH and CITGO have started to produce limited information and responsive documents on a rolling basis in a data room to which my Advisors and I have access. My Advisors and I are working with PDVH and CITGO on a reasonable plan and timeline for production of the remaining information that I have requested in connection with the performance of my duties.
- Commenced my due diligence investigation consistent with the May 27 Order.
- Continued numerous work streams to develop a draft of the Proposed Sale Procedures Order for submission to the Court by July 26, 2021 and started to prepare a draft explanatory report that explains the Proposed Sale Procedures Order to be filed contemporaneously therewith.

#### **Statement of Fees and Expenses**

Finally, the May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period June 1 through June 30, 2021, I have incurred an aggregate of \$1,189,648.91 of fees and expenses in connection with carrying out my duties as Special Master. This amount includes the monthly fees and expenses of counsel and me and the entire fee for Evercore’s services in connection with the matters contemplated by the May 27 Order. The Itemized Statement, attached as Annex B hereto, contains a breakdown of such fees and expenses among my Advisors and myself.

I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor’s consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: Counsel of Record (by CM/ECF and E-Mail)

# **EXHIBIT 3**

**DI 353**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER’S MONTHLY REPORT  
FOR THE PERIOD ENDED AUGUST 31, 2021**

Dated: September 20, 2021  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

September 20, 2021

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECE**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended August 31, 2021  
(this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips, including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended July 31, 2021 [D.I. 304] (the "**July Report**"). I hereby write to provide this Report for the period since the July Report through August 31, 2021.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Continued numerous work streams to finalize and file the Proposed Sale Procedures Order with the Court on August 9, 2021 [D.I. 302], which, as noted in the July Report, included preparation of a report and recommendation (the "**Report**"), which was filed contemporaneously therewith [D.I. 303].

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark  
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- Coordinated extensively with counsel to the Parties and ConocoPhillips on the terms of stipulations for the sharing of sealed filings of the Proposed Sale Procedures Order, the Report, objections, and replies with (i) the United States Government [D.I. 314] and (ii) counsel to the 2020 PDVSA Bondholders [D.I. 324].
- Reviewed and responded to informal requests from the Venezuela Parties' regarding the public source of certain information contained in the Report.
- Reviewed pleadings filed by the Sale Process Parties regarding redactions to the Proposed Sale Procedures Order and Report and discussed the same with my Advisors. [D.I. 307].
- Reviewed and analyzed objections filed by the Parties and ConocoPhillips to the Proposed Sale Procedures Order and began preparation of a reply brief in response to same [D.I. 341].
- Reviewed and analyzed statements, requests, and related documentation provided by the Sale Process Parties regarding the outstanding judgments of Crystallex and ConocoPhillips.
- Reviewed and analyzed informal objections raised to Evercore's retention received from the Sale Process Parties prior to the filing of the Proposed Sale Procedures Order and Report.
- In consultation with the Sale Process Parties, continued to negotiate the proposed terms pursuant to which Evercore Group L.L.C. ("**Evercore**") would serve as my financial advisor in connection with the implementation of the Proposed Sale Procedures Order should Your Honor enter the order and approve the engagement.
- Reviewed and analyzed objections filed by the Sale Process Parties to the fees and expenses requested in my July Report and drafted and filed a response thereto [D.I. 325].

### **Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period of August 1 through August 9, 2021, prior to filing the Proposed Sale Procedures Order, I have incurred an aggregate of \$319,156.89 of fees and expenses in connection with carrying out my duties as Special Master. As noted in my letter to the Court on August 30, 2021 [D.I. 325], I must request that the Court increase the fee cap set forth in the May 27 Order (as revised by subsequent order [D.I. 337]) to include \$319,156.89 of fees incurred by my Advisors and myself during the fee cap period up to and including submitting the Proposed Sale Procedures Order on August 9, 2021.

The Honorable Leonard P. Stark  
September 20, 2021 Public Version - February 28, 2023  
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Separate from the period subject to the fee cap, during the period of August 10 through August 31, 2021, after filing the Proposed Sale Procedures Order, I have incurred an aggregate of \$143,959.08 of fees and expenses in connection with carrying out my duties as Special Master. These amounts include the monthly fees and expenses of counsel in connection with the matters contemplated by the May 27 Order after filing the Proposed Sale Procedures Order. The Itemized Statement, attached as Annex D hereto, contains a breakdown of such fees and expenses among my Advisors and myself.

I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable and approve the increase of the fee cap to include additional fees of \$319,156.89 for the period through August 9, 2021. A proposed form of order is enclosed for Your Honor's consideration.

I am currently conferring with the Sale Process Parties regarding the preparation of procedures for the provision of a budget to the Sale Process Parties pursuant to the Court's September 8, 2021 *Memorandum Order* [D.I. 337]. In the meantime, I anticipate and estimate that my fees and expenses for the month of September, which I will set forth in my next Monthly Report, will be significantly lower than the amounts requested in this Monthly Report.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: Counsel of Record (by CM/ECF and E-Mail)

# **EXHIBIT 4**

**DI 377**



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER'S MONTHLY REPORT  
FOR THE PERIOD ENDED SEPTEMBER 30, 2021**

Dated: October 12, 2021  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

October 12, 2021

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended September 30, 2021 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended August 31, 2021 [D.I. 353] (the "**August Report**"). I hereby write to provide this Report for the period since the August Report through September 30, 2021.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Continued numerous work streams to address questions and issues related to the Proposed Sale Procedures Order, which was filed with the Court on August 9, 2021 [D.I. 302], including questions and issues related to the report and recommendation (the "**Report**") filed contemporaneously therewith [D.I. 303].

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark

October 12, 2021 Public Version - February 28, 2023

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- Prepared and filed a letter with the Court amending paragraph 53 of the Report [D.I. 373].
- Reviewed and analyzed objections filed by the Sale Process Parties to the Proposed Sale Procedures Order and prepared and filed a Response to Objections (the “**Response to Objections**”) in response to same [D.I. 341].
  - The Response to Objections included a revised Proposed Sale Procedures Order with proposed revisions designed to resolve objections filed by the Sale Process Parties.
- Leading up to the filing of the Response to Objections, continued to attempt to narrow the areas of dispute relating to the Proposed Sale Procedures Order, including, but not limited to, the terms pursuant to which Evercore Group L.L.C. would serve as my financial advisor in connection with the implementation of the Proposed Sale Procedures Order should Your Honor enter the order and approve the engagement.
- Reviewed and analyzed the letter Crystallex received from the Department of the Treasury’s Office of Foreign Assets Control (“**OFAC**”), dated September 10, 2021, as well as the related letters filed with the Court by Crystallex and the Venezuela Parties regarding the implications thereof [D.I. 346 and 352].
- Met with representatives from the United States, including representatives from the Department of Justice, the Department of State, and the Department of the Treasury, including OFAC, to discuss, among other things, the timeline and mechanics for implementing the Proposed Sale Procedures Order.
- Met and conferred with each of the Sale Process Parties and prepared a proposed form of order setting forth budgeting procedures pursuant to the Court’s September 8, 2021 *Memorandum Order* [D.I. 337] (the “**September Order**”), which proposed order was filed with the Court on September 29, 2021 [D.I. 370] (the “**Proposed Budget Procedures Order**”) and included a proposed initial budget as Exhibit A thereto (the “**Proposed Initial Budget**”).
  - The numerous steps that I took pursuant to the September Order in connection with preparing the Proposed Budget Procedures Order are detailed more fully in the cover letter I filed in connection therewith [D.I. 370].
- Reviewed and analyzed statements, requests, and related documentation provided by the Sale Process Parties regarding the outstanding judgments of Crystallex and ConocoPhillips.

The Honorable Leonard P. Stark  
October 12, 2021 Public Version - February 28, 2023  
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- Responded orally and in writing to questions, inquiries and requests for clarification from the Sale Process Parties on a number of topics and issues related to the proposed sale process.

### **Statement of Fees and Expenses**

Finally, the May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period September 1 through September 30, 2021, I have incurred an aggregate of \$263,519.31 of fees and expenses in connection with carrying out my duties as Special Master. This amount includes the monthly fees and expenses of counsel in connection with the matters contemplated by the May 27 Order. The Itemized Statement, attached as Annex E hereto, contains a breakdown of such fees and expenses among my Advisors and myself.

I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures  
cc: All Counsel of Record (via CM/ECF and E-Mail)

# **EXHIBIT 5**

**DI 410**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER'S MONTHLY REPORT  
FOR THE PERIOD ENDED OCTOBER 31, 2021**

Dated: November 23, 2021  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

November 23, 2021

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECE**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended October 31, 2021 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended September 30, 2021 [D.I. 377] (the "**September Report**"). I hereby write to provide this Report for the period since the September Report through October 31, 2021.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Continued work streams to address questions and issues related to the Proposed Sale Procedures Order, which was filed with the Court on August 9, 2021 [D.I. 302] (as subsequently revised by D.I. 341-1 and D.I. 391-1), including questions and issues related to the report and recommendation (the "**Report**") filed contemporaneously therewith [D.I. 303]

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark  
November 23, 2021 Public Version - February 28, 2023  
Page 2 of 3

- Prepared and filed a letter with the Court amending paragraph 53 of the Report at the request of the Venezuela Parties [D.I. 373].
- Reviewed and analyzed objections filed by the Sale Process Parties to the Proposed Sale Procedures Order, and responses thereto, in advance of the hearing scheduled for November 8, 2021 to consider entry of the Proposed Sale Procedures Order (the “*Hearing*”).
- Continued to attempt to narrow the areas of dispute relating to the Proposed Sale Procedures Order in advance of the Hearing.
- Met and conferred with certain of the Sale Process Parties in connection with a proposed form of order addressing disclosure requirements for Rosneft Trading S.A. and Petr6leos de Venezuela, S.A regarding the outstanding obligations owed to such parties, if any, purported to be secured by a pledge of the equity of CITGO Holding, Inc.

#### **Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period October 1 through October 31, 2021, I have incurred an aggregate of \$52,274.17 of fees and expenses in connection with carrying out my duties as Special Master. This amount includes the monthly fees and expenses of counsel in connection with the matters contemplated by the May 27 Order. The Itemized Statement, attached as Annex B hereto, contains a breakdown of such fees and expenses among my Advisors and myself.

The initial budget that I filed with the Court on September 29, 2021 [D.I. 370-2] (the “*Initial Budget*”) estimated \$117,000 for the period covered by this Monthly Report. The Initial Budget contemplated certain of the preparation work for the Hearing and efforts to narrow issues related to the Proposed Sale Procedures Order to be performed in October. A significant portion of such expenses were instead incurred in the first week of November and will be included in my next monthly report.

I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor’s consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States



The Honorable Leonard P. Stark  
November 23, 2021 Public Version - February 28, 2023  
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District Court for the District of  
Delaware

Enclosures  
cc: All Counsel of Record (via CM/ECF and E-Mail)

# **EXHIBIT 6**

**DI 424**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) | <b>PUBLIC VERSION</b> |
|                                   | ) |                       |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER’S MONTHLY REPORT  
FOR THE PERIOD ENDED NOVEMBER 30, 2021**

Dated: December 30, 2021  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

December 30, 2021

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended November 30, 2021 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petróleos de Venezuela, S.A.'s shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended October 31, 2021 [D.I. 410] (the "**October Report**"). I hereby write to provide this Report for the period since the October Report through November 30, 2021.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Continued work streams to address questions and issues related to the Proposed Sale Procedures Order and prepared the Second Revised Proposed Sale Procedures Order [D.I. 391-1] and the Third Revised Proposed Sale Procedures Order [D.I. 411-1].
- Reviewed and analyzed objections filed by the Sale Process Parties to the Proposed Sale Procedures Order, and responses thereto, in advance of the hearing scheduled

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark  
December 30, 2021 Public Version - February 28, 2023  
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for November 8, 2021 to consider entry of the Proposed Sale Procedures Order (the “*Hearing*”).

- Met and conferred with the Sale Process Parties and other interested parties seeking to participate in the Hearing and prepared and filed letters to the Court related thereto [D.I. 384 and D.I. 389].
- Continued to attempt to narrow the areas of dispute relating to the Proposed Sale Procedures Order both before and after the Hearing.
- Prepared and filed a summary and supplemental status report outlining the status of outstanding objections to the Proposed Sale Procedures Order filed by the Sale Process Parties, and responses thereto, and the Special Master’s efforts to resolve such objections in advance of the Hearing [D.I. 393].
- Met and conferred with certain of the Sale Process Parties in connection with a proposed form of order addressing disclosure requirements for Rosneft Trading S.A. and Petróleos de Venezuela, S.A regarding the outstanding obligations owed to such parties, if any, purported to be secured by a pledge of the equity of CITGO Holding, Inc., and filed a proposed form of order in connection therewith [D.I. 392] (the “*Rosneft Consent Order*”).
- Attended and participated in the Hearing and a subsequent meeting with Your Honor on November 15, 2021.

### **Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period November 1 through November 30, 2021, I have incurred an aggregate of \$280,445.76 of fees and expenses in connection with carrying out my duties as Special Master, of which \$198,318.82 was incurred between November 1 and November 8, 2021. This amount includes the monthly fees and expenses of counsel in connection with the matters described above. The Itemized Statement, attached as Annex G hereto, contains a breakdown of such fees and expenses among my Advisors and myself.

As noted in the October Report, my fees and expenses for the October period were only \$52,274.17 of the \$117,000.00 that had been budgeted for the period based on the initial budget that I filed with the Court on September 29, 2021 [D.I. 370-2] (the “*Initial Budget*”) as a portion of the work anticipated to be performed in October was instead not performed until November. The Initial Budget further anticipated that my Advisors and I would incur fees and expenses totaling \$101,750 from November 1 through November 8, 2021, for a total of \$217,750.00 for October 1, 2021 through November 8, 2021 (the “*Initial Budget Period*”). My total fees and expenses for the Initial Budget Period were \$250,592.99 which is a variance of approximately 15%

The Honorable Leonard P. Stark  
December 30, 2021 Public Version - February 28, 2023  
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of the budgeted amount for the period.<sup>2</sup> This variance is the result of greater than anticipated work performed in connection with, among other things, preparing the supplemental status reports requested by the Court in advance of the Hearing (including the summary of objections chart utilized at the Hearing) [*see* D.I. 390 and D.I. 391], drafting and coordinating the filing of the proposed Rosneft Consent Order [D.I. 392], and attending and participating in meet and confers related to the Hearing and related attempts to narrow issues regarding the Proposed Sale Procedures Order.

I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: All Counsel of Record (via CM/ECF and E-Mail)

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<sup>2</sup> In accordance with the Court's *Order Regarding Special Master Budget Procedures* [D.I. 395], I will prepare and file a new budget following entry of the Proposed Sale Procedures Order.

# **EXHIBIT 7**

**DI 435**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER'S MONTHLY REPORT  
FOR THE PERIOD ENDED DECEMBER 31, 2021**

Dated: January 26, 2022  
PUBLIC VERSION  
Dated: February 28, 2023



ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

January 26, 2022

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECE**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended December 31, 2021 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petróleos de Venezuela, S.A.'s ("**PDVSA**") shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended November 30, 2021 [D.I. 424] (the "**November Report**"). I hereby write to provide this Report for the period since the November Report through December 31, 2021.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Reviewed and analyzed supplemental OFAC-related briefing filed by the Sale Process Parties [D.I. 418, 419, and 421];
- Reviewed and analyzed the disclosure statements delivered by Rosneft Trading S.A. and PDVSA to the Special Master pursuant to the *Consent Order Regarding*

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark  
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Page 2 of 3

*Disclosure by Rosneft Trading S.A. and Petróleos de Venezuela, S.A. Regarding CITGO Holding Pledge [D.I. 396].*

- Reviewed and analyzed the Venezuela Parties' Response to the Special Master's Third Revised Proposed Sale Procedures Order; and
- Prepared and filed the November Report.

**Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period December 1 through December 31, 2021, I have incurred an aggregate of \$25,267.40 of fees and expenses in connection with carrying out my duties as Special Master. This amount includes the monthly fees and expenses of counsel in connection with the matters described above. The Itemized Statement, attached as Annex H hereto, contains a breakdown of such fees and expenses among my Advisors and myself.

I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: All Counsel of Record (via CM/ECF and E-Mail)

# **EXHIBIT 8**

**DI 464**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER’S MONTHLY REPORT  
FOR THE PERIOD ENDED APRIL 30, 2022**

Dated: May 17, 2022  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

May 17, 2022

**PUBLIC VERSION - February 28, 2023**  
**BY HAND DELIVERY & CM/ECE**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Status Report for the Period Ended April 30, 2022 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s ("**PDVSA**") shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a periodic status report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended February 28, 2022 [D.I. 448] (the "**February 2022 Report**"). I hereby write to provide this Report for the period since the February 2022 Report through April 30, 2022.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Reviewed and analyzed Your Honor's *Opinion* [D.I. 443] ("**March 2022 Opinion**") and related *Order* entered March 2, 2022 ("**March 2022 Order**").

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark

May 17, 2022 Public Version - February 28, 2023

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- Met and conferred with the Sale Process Parties as directed by the March 2022 Order in connection with preparation of a joint status report filed on behalf of the Special Master and the Sale Process Parties and prepared a proposed form of order regarding resolution of outstanding objections to the Proposed Sale Procedures Order [D.I. 446].
- Coordinated work streams to address Your Honor's rulings in the March 2022 Opinion related to the Proposed Sale Procedures Order and met and conferred with certain of the Sale Process Parties regarding preparation of a revised form of such order consistent with the March 2022 Opinion.
- Consistent with the March 2022 Opinion, negotiated the proposed terms pursuant to which Evercore Group L.L.C. ("**Evercore**") would serve as my financial advisor (on a non-contingency fee basis) in connection with the implementation of the Proposed Sale Procedures Order should Your Honor enter the order and approve the engagement.
- Continued to attempt to narrow the areas of dispute relating to the Proposed Sale Procedures Order and the proposed terms of Evercore's engagement.
- Prepared and filed a letter to the Court regarding the revised Proposed Sale Procedures Order and the Special Master's recommendation regarding Evercore's proposed engagement [D.I. 451], which included the Fourth Revised Proposed Sale Procedures Order [D.I. 451-1] and the Revised Proposed Evercore Engagement Letter [D.I. 451-1, Ex. 3-B] as attachments thereto.
- Reviewed and analyzed objections filed by the Sale Process Parties to the Revised Proposed Sale Procedures Order [D.I. 455, 456, 457] and prepared and filed a reply brief (the "**Reply Brief**") in response to same [D.I. 458].
- Reviewed and analyzed implications of Venezuela Parties' appeal of the Court's March 2022 Opinion to the Third Circuit [D.I. 454] on the sale process and reviewed pleadings filed in such appeal.
- Prepared and filed the February 2022 Report.

### **Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses to the Court. During the period March 1, 2022 through April 30, 2022, I have incurred an aggregate of \$183,219.08 of fees and expenses in connection with carrying out my duties as Special Master. This amount includes the monthly fees and expenses of counsel in connection with the matters described above. The Itemized Statement, attached as Annex J hereto, contains a breakdown of such fees and expenses among my Advisors and myself. I respectfully request that Your Honor

The Honorable Leonard P. Stark  
May 17, 2022 Public Version - February 28, 2023  
Page 3 of 3

determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: All Counsel of Record (via CM/ECF and E-Mail)

# **EXHIBIT 9**

**DI 495**



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

V.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Misc. No. 17-151-LPS

**PUBLIC VERSION**

**SPECIAL MASTER'S MONTHLY REPORT  
FOR THE PERIOD ENDED NOVEMBER 30, 2022**

Dated: December 28, 2022

PUBLIC VERSION

Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
PO Box 4570  
Wilmington, DE 19807

December 28, 2022

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Status Report for the Period Ended November 30, 2022 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s ("**PDVSA**") shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a periodic status report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended August 31, 2022 [D.I. 475] (the "**August 2022 Report**"). I hereby write to provide this Report for the period since the August 2022 Report through November 30, 2022.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Reviewed and analyzed Your Honor's *Oral Order* [D.I. 479] entered on September 29, 2022 ("**September 2022 Order**").

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark

December 28, 2022 Public Version - February 28, 2023

Page 2

- Met and conferred with the Sale Process Parties as directed by the September 2022 Order in connection with preparation of a joint status report to be filed by the Special Master.
- Coordinated work streams to address Your Honor's rulings in the September 2022 Order relating to the Proposed Sale Procedures Order and met and conferred with the Sale Process Parties regarding preparation of a revised form of such order consistent with the September 2022 Order.
- Prepared and filed the aforementioned Joint Status Report [D.I. 480] detailing the Special Master's and the Sale Process Parties' respective positions with respect to next steps in the sale process.
- Prepared and filed a revised Proposed Sale Procedures Order [D.I. 480-1] to account for the passage of time as per the September 2022 Order.
- Met with my Advisors regarding outreach to and negotiations with OFAC.
- Coordinated regarding a meeting with representatives of the United States Department of the Treasury and the United States Department of Justice to take place in January.
- Discussed Red Tree Investments, LLC's Motion to Intervene and to Modify the Sale Procedures Order [D.I. 483] (the "**Red Tree Motion**") and related pleadings with my Advisors.
- Prepared and filed a letter with the Court setting forth the Special Master's position on the Red Tree Motion [D.I. 493].
- Prepared and filed the August 2022 Report [D.I. 475].

### **Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses to the Court. During the period September 1, 2022 through November 30, 2022, my Advisors and I have incurred an aggregate of \$149,725.48 of fees and expenses in connection with carrying out my duties as Special Master, as shown in the table below.

|                                          |              |
|------------------------------------------|--------------|
| <b>Special Master</b>                    | \$15,494.50  |
| <b>Weil, Gotshal &amp; Manges LLP</b>    | \$96,316.88  |
| <b>Jenner &amp; Block LLP</b>            | \$33,415.30  |
| <b>Potter Anderson &amp; Corroon LLP</b> | \$4,498.80   |
| <b>Total</b>                             | \$149,725.48 |

The Honorable Leonard P. Stark  
December 28, 2022 Public Version - February 28, 2023  
Page 3

This amount includes the monthly fees and expenses of counsel in connection with the matters described above. The Itemized Statement, attached as Annex L hereto, contains a breakdown of such fees and expenses among my Advisors and myself. I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: All Counsel of Record (via CM/ECF and E-Mail)

# **EXHIBIT 10**

## **DI 304**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER'S MONTHLY REPORT  
FOR THE PERIOD ENDED JULY 31, 2021**

Dated: August 13, 2021  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

August 13, 2021

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
Chief Judge  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended July 31, 2021  
(this "**Report**")

Dear Chief Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips, including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended June 30, 2021 [D.I. 292] (the "**June Report**"). I hereby write to provide this Report for the period since the June Report through July 31, 2021.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Continued numerous work streams to develop a draft of the Proposed Sale Procedures Order for submission to the Court by August 9, 2021, which, as noted in the June Report, includes preparation of a report and recommendation that

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark

August 13, 2021 PUBLIC VERSION February 28, 2023

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explains the Proposed Sale Procedures Order and the justifications for, and assumptions underlying, the same, to be filed contemporaneously therewith.

- Prepared for and met with the Court to discuss the Proposed Sale Procedures Order in chambers on July 6, 2021.
  - On July 16, 2021, I provided an outline and summary of the Proposed Sale Procedures Order to counsel to the Parties and ConocoPhillips and held a scheduled call with each stakeholder to solicit their feedback and input during the week of July 19, 2021.
  - On July 23, 2021, I provided a draft of the Proposed Sale Procedures Order to counsel to the Parties and ConocoPhillips and solicited their feedback regarding the same.
- Maintained ongoing dialogue and consultation with the Parties and ConocoPhillips regarding the performance of my duties and obligations set forth in the May 27 Order.
  - My Advisors and I have held separate meetings with advisors to the Parties and ConocoPhillips to discuss the terms of the Proposed Sale Procedures Order and their concerns and recommendations in connection therewith.
  - Over the course of these discussions, the Venezuela Parties and ConocoPhillips both requested an extension of the deadline to file the Proposed Sale Procedures Order to provide additional time to consult with each stakeholder and to discuss, examine, and consider, with my Advisors, alternative procedures and timetables with respect to the Proposed Sale Procedures Order. After confirming that Crystallex did not have any objection to a two-week extension, I sought a two-week extension of the deadline to file the Proposed Sale Procedures Order, which Your Honor approved on July 22, 2021 [D.I. 298].
- Maintained contact and an open dialogue with the United States Government regarding development of the Proposed Sale Procedures Order.
  - On July 12, 2021 and again on July 15, 2021, my Advisors and I met with representatives from the United States, including representatives from the Department of Justice, Department of State and Department of the Treasury (including the Office of Foreign Assets Control (“**OFAC**”)) to discuss the Proposed Sale Procedures Order and to answer any questions.
  - On July 21, 2021, my Advisors held an all-advisors call with counsel to the Parties and ConocoPhillips to discuss OFAC licensing requirements and related regulatory considerations in connection with the design of the Proposed Sale Procedures Order.



The Honorable Leonard P. Stark

August 13, 2021 PUBLIC VERISON February 28, 2023

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- At the conclusion of the July 15, 2021 meeting with representatives of the United States identified above, we agreed to schedule a meeting to discuss the final form of the Proposed Sale Procedures Order after it is filed with the Court.
- Reviewed and analyzed statements and related documentation provided by Crystallex and ConocoPhillips regarding their outstanding judgments.
- Continued my due diligence investigation consistent with the May 27 Order.
  - My Advisors and I have continued to review documents uploaded on a rolling basis by PDVH and CITGO to a data room to which my Advisors and I have access.
- Negotiated with Evercore Group L.L.C. (“**Evercore**”) to serve as my financial advisor in connection with the implementation of the Proposed Sale Procedures Order should Your Honor enter the order and approve the engagement.
  - On July 26, 2021, I shared a draft Evercore engagement letter with the Parties and ConocoPhillips. I continue to consult with them regarding the proposed terms of Evercore’s engagement.

### **Statement of Fees and Expenses**

Finally, the May 27 Order requires that I submit an Itemized Statement of my fees and expenses on a monthly basis. During the period July 1 through July 31, 2021, I have incurred an aggregate of \$710,104.96 of fees and expenses in connection with carrying out my duties as Special Master. This amount includes the monthly fees and expenses of counsel in connection with the matters contemplated by the May 27 Order. The Itemized Statement, attached as Annex C hereto, contains a breakdown of such fees and expenses among my Advisors and myself.

The amount of fees and expenses incurred in July in connection with carrying out my duties as Special Master, together with those fees and expenses previously incurred and approved by the Court, aggregate \$2,186,786.85, which exceeds the \$2 million cap on fees and expenses that may be incurred in connection with the submission to the Court of the Proposed Sale Procedures Order, as provided in the May 27 Order. A large portion of this excess is attributable to the extension of the initial July 26<sup>th</sup> filing date of the Proposed Sale Procedures Order, as requested by certain of the Parties, and the balance relates to work responding to the concerns raised by the Parties before filing the Proposed Sale Procedures Order and ensuring that the Report reflected my consideration of those concerns for the benefit of the Court and the Parties.

The May 27 Order provides that the fee cap may be increased by further Order of the Court and contemplates that I may request leave to request such an increase. Of course, here we incurred costs largely at the request of the Parties and, frankly, this was an extremely complex task. My suggestion for your consideration is that Your Honor determine the July fees and expenses are

The Honorable Leonard P. Stark

August 13, 2021 PUBLIC VERSION February 28, 2023

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regular and reasonable and provide for an increase of the cap by \$186,786.85 at this time in the Order approving the fees and expenses, should you agree that they are regular and reasonable. We would then address the increased costs for August next month, once we get through Parties filing objections and filing a reply for the Court's consideration. We are doing our very best to be efficient, but as Your Honor is aware, the Parties have different perspectives and objectives, and tend to take an active role in these proceedings. My Advisors and I are trying to clear as many of the minor disputes as we can, and attempt (sometimes unsuccessfully) to garner consensus, rather than have every issue come before the Court. Our intent is to ultimately save time and expense for the Parties and be efficient with the Court's valuable time. Of course, if Your Honor would like me to proceed along a different procedural footing to request an increase in costs for July rather than this suggested path, I am happy to do so.

I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order—which also provides for the increased expenditures—is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: Counsel of Record (by CM/ECF and E-Mail)

# **ANNEX C**

ROBERT B. PINCUS, in his capacity as  
Special Master for the United States District of Delaware  
108 Rockford Grove Lane  
Wilmington, DE 19806

August 13, 2021

**FOR SERVICES RENDERED FOR THE  
PERIOD JULY 1, 2021 THROUGH JULY 31, 2021**

Fees of the Special Master (details attached) **\$41,078**

Expenses

Fees and Expenses of Counsel (details attached)

|                                |                     |
|--------------------------------|---------------------|
| Jenner & Block LLP             | \$31,308.30         |
| Potter, Anderson & Corroon LLP | \$21, 817.50        |
| Weil, Gotshal & Manges LLP     | <u>\$615,901.16</u> |

**Total Expenses** **\$669,026.96**

**Total Fees and Expenses** **\$710,104.96**

**REDACTED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                      |
|-----------------------------------|---|----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                      |
|                                   | ) |                      |
| Plaintiff,                        | ) |                      |
|                                   | ) |                      |
| v.                                | ) | Misc. No. 17-151-LPS |
|                                   | ) |                      |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                      |
|                                   | ) |                      |
| Defendant.                        | ) |                      |
|                                   | ) |                      |
| _____                             | ) |                      |

**ORDER APPROVING FEES AND EXPENSES  
SUBMITTED BY SPECIAL MASTER**

Upon consideration of the itemized statement of fees and expenses submitted by the Court-appointed Special Master by letter dated August 13, 2021 (the “Itemized Statement”), and pursuant to the Court’s Order Regarding Special Master (D.I. 277),

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2021, that:

1. The Court, having considered any objections or comments from the Parties and ConocoPhillips, finds the fees and expenses in the Itemized Statement are regular and reasonable, and the Itemized Statement is approved.
2. The fee cap of \$2 million referenced in the *Order Regarding Special Master* [D.I. 277], dated May 27, 2021 is hereby increased by \$186,786.85 to a total of \$2,186,786.85.
3. Each of Crystallex, ConocoPhillips, and the Venezuela Parties shall make payment of one-third of the amount set forth in the Itemized Statement within 30 calendar days, pursuant to the terms set forth in the Order Regarding Special Master.

# **EXHIBIT 11**

**DI 448**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                       |
|-----------------------------------|---|-----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                       |
|                                   | ) |                       |
| Plaintiff,                        | ) |                       |
|                                   | ) |                       |
| v.                                | ) | Misc. No. 17-151-LPS  |
|                                   | ) |                       |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                       |
|                                   | ) | <b>PUBLIC VERSION</b> |
| Defendant.                        | ) |                       |
|                                   | ) |                       |
| _____                             | ) |                       |

**SPECIAL MASTER’S MONTHLY REPORT  
FOR THE PERIOD ENDED FEBRUARY 28, 2022**

Dated: March 29, 2022  
PUBLIC VERSION  
Dated: February 28, 2023



ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

March 29, 2022

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Monthly Report for the Period Ended February 28, 2022 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s ("**PDVSA**") shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a monthly report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended December 31, 2021 [D.I. 435] (the "**December Report**"). I hereby write to provide this Report for the period since the December Report through February 28, 2022.

### **Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Reviewed and analyzed letters filed with the Court by the Venezuela Parties [D.I. 429] and Crystallex [D.I. 431] regarding the National Assembly of Venezuela's vote to extend the interim presidency of President Juan Guaidó and related considerations with respect to certain agencies of the U.S. Government (together, the "**Guaidó Letters**").

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.

The Honorable Leonard P. Stark  
March 29, 2022 Public Version - February 28, 2023  
Page 2 of 3

- Correspondence related to the Guaidó Letters and the issues raised therein with Your Honor and my Advisors.
- Responded to inbound communications from counsel to certain parties that are in the process of seeking an Attached Judgment (as defined in the proposed Sale Procedures Order).
- Prepared and filed the December Report.

**Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses to the Court. During the period January 1, 2022 through February 28, 2022, I have incurred an aggregate of \$7,971.70 of fees and expenses in connection with carrying out my duties as Special Master. This amount includes the monthly fees and expenses of counsel in connection with the matters described above. The Itemized Statement, attached as Annex I hereto, contains a breakdown of such fees and expenses among my Advisors and myself. I respectfully request that Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: All Counsel of Record (via CM/ECF and E-Mail)

# **ANNEX I**

**REDACTED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                      |
|-----------------------------------|---|----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                      |
|                                   | ) |                      |
| Plaintiff,                        | ) |                      |
|                                   | ) |                      |
| v.                                | ) | Misc. No. 17-151-LPS |
|                                   | ) |                      |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                      |
|                                   | ) |                      |
| Defendant.                        | ) |                      |
|                                   | ) |                      |
|                                   | ) |                      |
|                                   | ) |                      |

**ORDER APPROVING FEES AND EXPENSES  
SUBMITTED BY SPECIAL MASTER**

Upon consideration of the itemized statement of fees and expenses submitted by the Court-appointed Special Master by letter dated March 29, 2022 (the “Itemized Statement”), and pursuant to the Court’s Order Regarding Special Master (D.I. 277),

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2022, that:

1. The Court, having considered any objections or comments from the Parties and ConocoPhillips, finds the fees and expenses in the Itemized Statement are regular and reasonable, and the Itemized Statement is approved.
2. The Court hereby approves fees in the amount of \$7,971.70 for the period of January 1 to February 28, 2022.
3. Each of Crystallex, ConocoPhillips, and the Venezuela Parties shall make payment of one-third of the amount set forth in the Itemized Statement within 30 calendar days, pursuant to the terms set forth in the Order Regarding Special Master.

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Circuit Judge, United States Court of Appeals for  
the Federal Circuit

# **EXHIBIT 12**

**DI 475**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

-----  
CRYSTALLEX INTERNATIONAL CORP., )

Plaintiff, )

v. )

BOLIVARIAN REPUBLIC OF VENEZUELA, )

Defendant. )  
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Misc. No. 17-151-LPS

**PUBLIC VERSION**

**SPECIAL MASTER'S MONTHLY REPORT  
FOR THE PERIOD ENDED AUGUST 31, 2022**

Dated: September 9, 2022  
PUBLIC VERSION  
Dated: February 28, 2023

ROBERT B. PINCUS in his capacity as  
Special Master for the United States District Court for the District of Delaware  
108 Rockford Gove Lane  
Wilmington, DE 19806

September 9, 2022

**PUBLIC VERSION - February 28, 2023**

**BY HAND DELIVERY & CM/ECF**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*, D. Del. C.A. No. 1:17-mc-00151-LPS; Special Master's Status Report for the Period Ended August 31, 2022 (this "**Report**")

Dear Judge Stark:

By order dated April 13, 2021 [D.I. 258], Your Honor appointed me as Special Master in this case to design, oversee, and implement the sale of Petroleos de Venezuela, S.A.'s ("**PDVSA**") shares of PDV Holding Inc. On May 27, 2021, Your Honor issued the *Order Regarding Special Master* [D.I. 277] (the "**May 27 Order**")<sup>1</sup> setting forth, among other things, various obligations and duties applicable to the Special Master, the Parties, and ConocoPhillips (together with the Parties, the "**Sale Process Parties**"), including my obligation to provide the Court with a periodic status report concerning my progress and efforts. The last report that I submitted to the Court was for the period ended April 30, 2022 [D.I. 468] (the "**April 2022 Report**"). I hereby write to provide this Report for the period since the April 2022 Report through August 31, 2022.

**Summary of Events Taking Place this Period**

During this period, I have undertaken the following actions, with the assistance of my advisors (collectively, the "**Advisors**"), in accordance with my duties and obligations set forth in the May 27 Order:

- Reviewed and analyzed Your Honor's *Memorandum Order* [D.I. 469] entered on July 27, 2022 ("**July 2022 Order**").

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<sup>1</sup> All capitalized terms used but not otherwise defined herein, have the meanings ascribed to such terms in the May 27 Order.



- Met and conferred with the Sale Process Parties as directed by the July 2022 Order in connection with preparation of a joint status report to be filed by the Special Master.
- Coordinated work streams to address Your Honor's rulings in the July 2022 Order relating to the Proposed Sale Procedures Order and met and conferred with the Sale Process Parties regarding preparation of a revised form of such order consistent with the July 2022 Order.
- Prepared and filed the aforementioned Joint Status Report [D.I. 472] detailing the Special Master's and the Sale Process Parties' respective positions with respect to next steps in the sale process and the Special Master's potential engagement with the PDVSA 2020 Bondholders.
- Prepared and filed a revised Proposed Sale Procedures Order [D.I. 472-1] incorporating Your Honor's rulings in the July 2022 Order.
- Prepared and filed the April 2022 Report [D.I. 468].

#### **Statement of Fees and Expenses**

The May 27 Order requires that I submit an Itemized Statement of my fees and expenses to the Court. During the period May 1, 2022 through August 31, 2022, I have incurred an aggregate of \$142,711.58 of fees and expenses in connection with carrying out my duties as Special Master, as shown in the table below.

|                                          |                     |
|------------------------------------------|---------------------|
| <b>Special Master</b>                    | \$9,889.50          |
| <b>Weil, Gotshal &amp; Manges LLP</b>    |                     |
| May 2022                                 | \$3,103.04          |
| June 2022                                | \$1,193.80          |
| July 2022                                | \$42,825.40         |
| August 2022                              | \$66,565.35         |
| <b>Jenner &amp; Block LLP</b>            |                     |
| May 2022                                 | \$121.00            |
| August 2022                              | \$2,848.20          |
| <b>Potter Anderson &amp; Corroon LLP</b> |                     |
| May 2022                                 | \$1,696.60          |
| July 2022                                | \$750.30            |
| August 2022                              | \$4,726.00          |
| <b>Evercore Group LLC</b>                | \$8,992.39          |
| <b>Total</b>                             | <b>\$142,711.58</b> |

This amount includes the monthly fees and expenses of counsel in connection with the matters described above. The Itemized Statement, attached as Annex K hereto, contains a breakdown of such fees and expenses among my Advisors and myself. I respectfully request that

Your Honor determine that such fees and expenses are regular and reasonable. A proposed form of order is enclosed for Your Honor's consideration.

I am available at the convenience of the Court, should Your Honor have any questions.

Respectfully Yours,

*/s/ Robert B. Pincus*

Robert B. Pincus, in my capacity as  
Special Master for the United States  
District Court for the District of  
Delaware

Enclosures

cc: All Counsel of Record (via CM/ECF and E-Mail)

# ANNEX K

**REDACTED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

|                                   |   |                      |
|-----------------------------------|---|----------------------|
| CRYSTALLEX INTERNATIONAL CORP.,   | ) |                      |
|                                   | ) |                      |
| Plaintiff,                        | ) |                      |
|                                   | ) |                      |
| v.                                | ) | Misc. No. 17-151-LPS |
|                                   | ) |                      |
| BOLIVARIAN REPUBLIC OF VENEZUELA, | ) |                      |
|                                   | ) |                      |
| Defendant.                        | ) |                      |
|                                   | ) |                      |

**ORDER APPROVING FEES AND EXPENSES  
SUBMITTED BY SPECIAL MASTER**

Upon consideration of the itemized statement of fees and expenses submitted by the Court-appointed Special Master by letter dated September 9, 2022 (the “Itemized Statement”), and pursuant to the Court’s Order Regarding Special Master (D.I. 277),

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2022, that:

1. The Court, having considered any objections or comments from the Sale Process Parties, finds the fees and expenses in the Itemized Statement are regular and reasonable, and the Itemized Statement is approved.
2. The Court hereby approves fees and expenses in the amount of \$142,711.58 for the period of May 1, 2022 to August 31, 2022.
3. Each of Crystallex, ConocoPhillips, and the Venezuela Parties shall make payment of one-third of the amount set forth in the Itemized Statement within 30 calendar days, pursuant to the terms set forth in the Order Regarding Special Master.

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The Honorable Leonard P. Stark  
Circuit Judge, United States Court of Appeals  
for the Federal Circuit